

ORIGINAL

FILED
DISTRICT COURT OF GUAM

JAN 08 2008

JEANNE G. QUINATA
Clerk of Court

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUNE GONZAL QUINDO, JR.,

Defendant.

CRIMINAL CASE NO. 07-00073


**GOVERNMENT'S MOTION TO
FILE JUSTIFICATION UNDER SEAL**

COMES NOW the United States of America, by and through undersigned counsel, and moves this Honorable Court for an Order allowing it to file its justification under seal. The government makes this motion because the justification explains in detail the reasons that it is seeking a substantial assistance downward departure for defendant. It believes the nature of the information has the potential of resulting in retaliation to the defendant.

RESPECTFULLY SUBMITTED this 8th day of January, 2007.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By:


ROSETTA L. SAN NICOLAS
Assistant U.S. Attorney